

JOEL A. ACKERMAN  
JA 4027

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ZUCKER, GOLDBERG & ACKERMAN, LLC  
Attorneys for Secured Creditor  
CitiMortgage, Inc., successor in interest by merger to CitiFinancial Mortgage Company Inc.  
200 Sheffield Street, Suite 301  
P.O. Box 1024  
Mountainside, New Jersey 07092-0024  
1-908-233-8500

IN RE:  
Vincent S. Murphy  
DEBTOR. : UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY  
: CHAPTER 7  
: CASE NO. 07-27946-KCF  
: **NOTICE OF MOTION TO  
VACATE THE AUTOMATIC STAY**  
: **(RET: 03/11/2008@ 10:00am)**  
: **ORAL ARGUMENT WAIVED**

TO:  
Vincent S. Murphy  
9 Assateague Rd  
Howell, NJ 07731

Timothy P. Neumann  
Attorney for Debtor  
25 Abe Voorhees Drive  
Manasquan, NJ 08736

Andrea Dobin Trustee  
50 West State Street, Suite 1400  
P. O. Box 1298  
Trenton, NJ 08608

SIRS:

PLEASE TAKE NOTICE that on 03/11/2008@ 10:00am, or soon as counsel may be heard, the undersigned, attorneys for CitiMortgage, Inc., successor in interest by merger to CitiFinancial Mortgage Company Inc., the Secured Creditor, will move before the United States Bankruptcy Court, The Honorable Kathryn C. Ferguson, presiding, U.S. Courthouse, 402 East State Street, 4th Floor, Trenton, NJ 08608 for an Order Vacating the Automatic Stay, with respect to the debtor's property at 9 Assateague Road, Howell, NJ 07731, and allowing CitiMortgage, Inc., successor in interest by merger to CitiFinancial Mortgage Company Inc., the Secured Creditor, to continue its foreclosure action, by reason of the Secured Creditor's interest in the premises located at 9 Assateague Road, Howell, NJ 07731 being inadequately protected in violation of 11 USC 362(d)(1) and

TAKE FURTHER NOTICE that the facts CitiMortgage, Inc., successor in interest by merger to CitiFinancial Mortgage Company Inc., the Secured Creditor relies upon, as set forth on the accompanying certification, and the basis for relief from the automatic stay, do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion, and

TAKE FURTHER NOTICE that oral argument is hereby not requested, and

TAKE FURTHER NOTICE that the within Notice of Motion shall be deemed uncontested unless responsive papers are filed in accordance with Rule 3(a) and (d) of the "Local Rules of Bankruptcy Practice".

ZUCKER, GOLDBERG & ACKERMAN, LLC  
Attorneys for Secured Creditor  
CitiMortgage, Inc., successor in interest by merger to  
CitiFinancial Mortgage Company Inc.

/s/ JOEL A. ACKERMAN  
JOEL A. ACKERMAN  
MEMBER OF THE FIRM

DATED: February 11, 2008

**THIS IS AN ATTEMPT TO COLLECT A DEBT.  
ANY INFORMATION OBTAINED  
WILL BE USED FOR THAT PURPOSE.**